

1 MORGAN, LEWIS & BOCKIUS LLP

2 Michael J. Puma (*pro hac vice*)

2 Antonia M. Moran (*pro hac vice*)

2222 Market Street

3 Philadelphia, PA 19103

4 Tel: +1.215.963.5000

4 Fax: +1.215.963.5001

5 michael.puma@morganlewis.com

5 toni.moran@morganlewis.com

6 Sarah Zenewicz (*pro hac vice*)

7 One Market, Spear Street Tower

7 San Francisco, CA 94105

8 Tel: +1.415.442.1000

8 Fax: +1.415.442.1001

9 sarah.zenewicz@morganlewis.com

9 Attorneys for Defendants

10 Aramark Sports and Entertainment Group, LLC,

11 Aramark Sports and Entertainment Services, LLC,

12 Aramark Sports, LLC, Aramark Services, Inc., and

13 Mandalay Bay, LLC

14 *Additional counsel on the following page*

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 DELORES CHAPMAN, an individual, on
behalf of herself and others similarly situated,

18 Plaintiff,

19 v.

20 LAS VEGAS ACES d/b/a and a/k/a LAS
VEGAS BASKETBALL L.P.; MVP EVENT
21 PRODUCTIONS LLC d/b/a and a/k/a MVP
EVENT STAFFING; MANDALAY BAY,
22 LLC; ARAMARK SPORTS AND
ENTERTAINMENT GROUP, LLC;
23 ARAMARK SPORTS AND
ENTERTAINMENT SERVICES, LLC;
24 ARAMARK SPORTS, LLC; ARAMARK
SERVICES, INC.; GREG FIELDING; DOES 1
25 through 50, inclusive

26 Defendants.

27 Case No. 2:23-cv-00278-APG-MDC

28 **JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
DEFENDANTS' DEADLINE TO
RESPONSE TO SECOND AMENDED
COMPLAINT AND CONTINUE STAY**

(FIRST REQUEST)

Action Filed: February 22, 2023

1 Dora V. Lane
2 Nevada Bar No. 8424
3 Steven J.T. Washington
4 Nevada Bar No. 14298
5 HOLLAND & HART LLP
6 9555 Hillwood Drive, 2nd Floor
7 Las Vegas, NV 89134
8 Phone: 702.669.4600
9 Fax: 702.669.4650
10 DLane@hollandhart.com
11 SJWashington@hollandhart.com

12 Attorneys for Defendant
13 Las Vegas Basketball L.P. d/b/a
14 and a/k/a Las Vegas Aces
15 (erroneously sued as LAS VEGAS ACES
16 d/b/a and a/k/a LAS VEGAS BASKETBALL L.P.)

17 GABROY | MESSER
18 Christian Gabroy, NV Bar No. 8805
19 Kaine Messer, NV Bar No. 14240
20 170 South Green Valley Parkway, Ste. 280
21 Henderson, NV 89012
22 Tel: +1.702.259.7000
23 Fax: +1.702.259.7704
24 christian@gabroy.com
25 kmesser@gabroy.com

26 Attorneys for Plaintiff
27 DELORES CHAPMAN, on behalf of
28 herself and all others similarly situated

1 This Joint Stipulation is entered into by and between Plaintiff Delores Chapman (“Plaintiff”)
2 and Defendants Las Vegas Basketball L.P. d/b/a and a/k/a Las Vegas Aces (“Las Vegas Aces”)
3 (*erroneously sued as Las Vegas Aces d/b/a and a/k/a Las Vegas Basketball L.P.*), Aramark Sports
4 and Entertainment Group, LLC, Aramark Sports and Entertainment Services, LLC, Aramark Sports,
5 LLC, Aramark Services, Inc. and Mandalay Bay, LLC (“Aramark Defendants and Mandalay Bay”
6 and collectively with the Las Vegas Aces, the “Defendants”) by and through their respective
7 counsel of record based upon the following facts establishing good cause:

8 WHEREAS, on August 14, 2024, the Court granted the Aramark Defendants and Mandalay
9 Bay’s Motion to Dismiss or Strike Plaintiff’s First Amended Complaint (ECF No. 68) in its entirety
10 and granted Plaintiff leave to file a Second Amended Complaint (“SAC”) by September 10, 2024;

11 WHEREAS, on September 10, 2024, Plaintiff filed the SAC (ECF No. 70) reasserting the
12 same claims against all Defendants;

13 WHEREAS, the Aramark Defendants and Mandalay Bay intend to file a Motion to Dismiss
14 and/or Strike and the Las Vegas Aces intend to file a Motion for Judgment on the Pleadings in
15 response to the SAC;

16 WHEREAS, Defendants’ deadline to respond to the SAC is currently September 24, 2024
17 (Fed. R. Civ. P. 15(a)(3));

18 WHEREAS, the Parties are meeting and conferring on a potential global resolution of this
19 action;

20 WHEREAS, in light of those ongoing discussions, and in the interest of judicial economy
21 and efficiency, the Parties have mutually agreed to extend Defendants’ response deadline by 30
22 days to October 24, 2024 and continue the stay of this action (ECF No. 58);

23 WHEREAS, this is the first request to extend the time for Defendants to respond to
24 Plaintiff’s SAC.

25 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through the Parties’
26 respective counsel as follows:

- 27 1. The stay entered on November 29, 2023, remains in place;
28 2. Defendants shall have until October 24, 2024, to file a response to the SAC.

1 DATED this 18th day of September 2024

2 **HOLLAND & HART LLP**

3 /s/ Steven J.T. Washington

4
5 Dora V. Lane (NV Bar No. 8424)
6 Steven J.T. Washington (NV No. 14298)
7 9555 Hillwood Drive, 2nd Floor
8 Las Vegas, NV 89134

9
10 *Attorneys for Defendant*
11 *Las Vegas Basketball L.P. d/b/a and a/k/a*
12 *Las Vegas Aces (erroneously sued as LAS*
13 *VEGAS ACES d/b/a and a/k/a LAS VEGAS*
14 *BASKETBALL L.P.)*

15 DATED this 18th day of September 2024

16 **MORGAN, LEWIS & BOCKIUS LLP**

17 /s/ Sarah Zenewicz

18 **MORGAN, LEWIS & BOCKIUS LLP**

19 Michael J. Puma (*pro hac vice* forthcoming)
20 Antonia M. Moran (*pro hac vice* pending)
21 2222 Market Street
22 Philadelphia, PA 19103

23 **MORGAN, LEWIS & BOCKIUS LLP**

24 Sarah Zenewicz (*pro hac vice* pending)
25 One Market, Spear Street Tower
26 San Francisco, CA 94105

27 **LEWIS BRISBOIS BISGAARD & SMITH LLP**

28 Jeffrey D. Winchester (NV Bar No. 10279)
29 6385 S. Rainbow Boulevard, Suite 600
30 Las Vegas, NV 89118

31 *Attorneys for Aramark Entities and*
32 *Mandalay Bay, LLC*

DATED this 18th day of September 2024

GABROY | MESSER

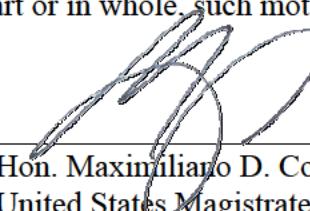
/s/ Kaine Messer

Christian Gabroy (NV Bar No. 8805)
Kaine Messer (NV Bar No. 14240)
170 South Green Valley Parkway, Ste. 280
Henderson, NV 89012

Attorneys for Plaintiff

ORDER

If all defendants file an answer to the SAC, the parties shall submit an amended stipulated discovery plan and scheduling order by November 14, 2024. If any defendant files a motion to dismiss in response to the SAC, the parties shall submit an amended stipulated discovery plan and scheduling order within 21 days of the entry of an order which denies, in part or in whole, such motion to dismiss.


Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
Dated: 9/19/24